

### **REMARKS**

This is a full and timely response to the outstanding non-final Office Action mailed February 4, 2005. Upon entry of the amendments in this response, claims 2, 4 - 14, 16, and 20 - 25 and 39 - 42 remain pending. In particular, Applicants have added claims 39 - 42, and have canceled claims 26 - 32 without prejudice, waiver, or disclaimer. Applicants have canceled claims 26 - 32 merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### **Allowable Subject Matter**

Applicants acknowledge that claims 2, 4 - 14, 16 and 20 - 25 are allowed.

### **Rejections Under 35 U.S.C. §112**

The Office Action indicates that claims 26 - 27 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. As set forth above, Applicants have canceled claims 26 and 27 and respectfully assert that the rejection has been rendered moot.

### **Rejections under 35 U.S.C. §102**

The Office Action indicates that claims 26 and 28 - 29 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Samworth*. The Office Action further indicates that claims 26

and 28 – 30 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Morimatsu*. As set forth above, Applicants have canceled claims 26 and 28 - 30 and respectfully assert that the rejections have been rendered moot.

### **Rejections under 35 U.S.C. §103**

The Office Action indicates that claims 31 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Samworth* or *Morimatsu*. The Office Action also indicates that claims 27 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Samworth* or *Morimatsu* in view of *De Maio*. As set forth above, Applicants have canceled claims 27, 31 and 32 and respectfully assert that the rejections have been rendered moot.

### **Newly Added Claims**

Upon entry of the amendments in this response, Applicants have added claims 39 – 42. Applicants respectfully assert that these claims are in condition for allowance.

In particular, claim 39 recites:

39. An image forming system for halftoning an image, said system comprising:  
an image forming device operative to:  
receive an input pixel value for a pixel location within the image;  
*modulate the dot density of the image by controlling the dot density for the pixel location within the image using the input pixel value and performing dispersed dot halftoning to produce a dot position based on the dot density; and*  
*modulate the dot size of printed dots to obtain a printed halftone image by controlling the dot size for the pixel location within an image using the input pixel value and performing dot size modulation based on the dot size and the dot position.*

(Emphasis Added).

Applicants respectfully assert that the cited art, either individually or in combination, does not teach or reasonably suggest at least the features/limitations emphasized above in

claim 39. Therefore, Applicants respectfully assert that claim 39 is in condition for allowance.

Since claims 40 – 42 are dependent claims that include all of the features/limitations of claim 39, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that may serve as an independent basis for patentability.

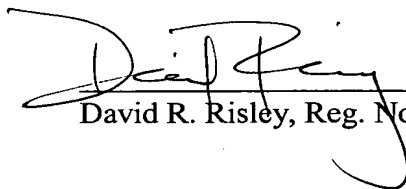
**Cited Art Made of Record**

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

### CONCLUSION

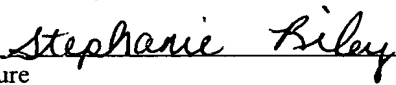
In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

  
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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on 4/19/05.

  
Signature